

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
MARVIN A. BROOKS	*	BANKRUPTCY NO. 19-15914
	*	
Debtor	*	

**ORDER**

AND NOW, this       day of       , 202 , upon  
consideration of Flagstar Bank, FSB Motion for Relief from the  
Automatic Stay and Debtor's answer thereto, and after hearing, it  
is hereby ORDERED and DECREED that;

The Motion of Flagstar Bank, FSB for Relief From The  
Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

\_\_\_\_\_  
J.

Kenneth G. Harrison, Esquire  
Fine Neshaminy Interplex Suite 115  
Trevose, PA 19053

William C. Miller, Esquire (Trustee)  
P.O. Box 1229  
Philadelphia, PA 19105

Jerome Blank, Esquire  
Phelan Hallinan Diamond & Jones  
One Penn Center Plaza  
1617 JFK Boulevard, Suite 1400  
Philadelphia, PA 19103

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MARVIN A. BROOKS	*	BANKRUPTCY NO. 19-15914
	*	
Debtors	*	

**DEBTORS' ANSWER TO THE MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtor, Marvin A. Brooks, by and through his attorney,  
Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Denied as stated. The non-filing co-debtor, Inbal Zohar was never on the deed.
3. Admitted.
4. Denied as a conclusion of law upon which no responsive pleading is required.
5. Denied. Debtor has no knowledge of Movant's reasons to institute foreclosure proceedings.
6. Admitted.
7. Denied as stated. Debtor have no knowledge of Movant's fees. Debtor believes that Movant has not credited all his payments to them. All other allegations are ednied as conclusions of law upon which no responsive pleading is required.
8. Denied as a conclusion of law upon which no responsive pleading is required.
9. Denied as a conclusion of law upon which no responsive pleading is required.
10. Denied as a conclusion of law upon which no responsive

pleading is required.

11. Denied as a conclusion of law upon which no responsive pleading is required.

12. Denied as a conclusion of law upon which no responsive pleading is required.

#### DEFENSES

1. The Debtor has substantial equity in their property and Movant has been afforded adequate protection of its interest.

2. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its foreclosure.

3. If Movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor, Marvin A. Brooks, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053